



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

FRANKLIN CONSTRUCTION GROUP, LLC,

Plaintiff,

v.

Civil Action No. 3:24-cv-01255

WILLIAM SHORE; JWSC, LLC;
KEITH MEADOWS; JOSEPH HEATH;
HYDS INC.; DEAN BINGHAM;
LUNDON JOHNSON; TYLER WEBER
JOEL CHEVRETTE; DANNY KNOWLES;
SCOTT MATTHEWS; and LOWE'S HOME
CENTERS, INC.,

Defendants.

**UNOPPOSED JOINT MOTION FOR EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND TO THE COMPLAINT OF DEFENDANTS HYDS, INC.,
KEITH MEADOWS, AND JOSEPH HEATH**

COME NOW, the Defendants, HYDS, Inc., Keith Meadows, and Joseph Heath ("Defendants"), by and through counsel, and respectfully move this Court for an extension of time to January 17, 2025, to answer or otherwise respond to the Complaint filed by Plaintiff, Franklin Construction Group, LLC ("Plaintiff"). In support of this unopposed motion, Defendant states as follows:

1. On October 21, 2024, Plaintiff filed a Complaint in the above-styled action.
2. Defendant, HYDS, Inc., was served with the Complaint on October 24, 2024.
3. HYDS, Inc.'s response to the Complaint was due on November 14, 2024, twenty-one (21) days after service of the Complaint, per Fed. R. Civ. P. 12(a)(1)(A)(i).

4. Defendant, Keith Meadows, was served with the Complaint on November 11, 2024.

5. Mr. Meadow's response to the Complaint is due on December 2, 2024, twenty-one (21) days after service of the Complaint, per Fed. R. Civ. P. 12(a)(1)(A)(i).

6. Defendant, Joseph Heath, was served with the Complaint on November 11, 2024.

7. Mr. Heath's response to the Complaint is due on December 2, 2024, twenty-one (21) days after service of the Complaint, per Fed. R. Civ. P. 12(a)(1)(A)(i).

8. In order for Defendants' counsel to have sufficient time to investigate Plaintiff's claims so that these Defendants may properly address all allegations contained in the Complaint and properly assert all available affirmative defenses, Defendants move, pursuant to Fed. R. Civ. P. 6(b)(1)(A) and L.R. 6.01(a)(1), for an extension of time to January 17, 2025, to answer or otherwise respond to the Complaint.

9. Defendants do not file this motion to unnecessarily delay the litigation but to sufficiently investigate the claims contained in the Complaint in order to properly respond to same. Plaintiff will not be unduly prejudiced if the Court grants this motion, and this is the moving Defendants' first request for an extension of time in this action.

10. Plaintiff's attorney, Todd E. Panther, has indicated that Plaintiff has no objection to the relief sought in this Motion. Therefore, the motion is being filed as unopposed per L.R. 6.01(a)(4)(A).

WHEREFORE, Defendants, HYDS, Inc., Keith Meadows, and Joseph Heath, respectfully requests that this Court grant this Unopposed Motion for Extension of Time to Answer or Otherwise Respond to the Complaint to January 17, 2025, and for any other relief the Court deems just and proper.

Dated this 25th day of November, 2024.

Respectfully submitted,

/s/ Don L. Hearn, Jr.

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*Attorneys for Defendants, HYDS Inc., Keith
Meadows, and Joseph Heath*

CERTIFICATE OF SERVICE

I, Don L. Hearn, Jr., certify that on or about this date, I served a true and correct copy of the foregoing electronically via the Court's CM/ECF system on the following:

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Dated: November 25, 2024

/s/ Don L. Hearn, Jr.

Don L. Hearn, Jr.